



September 19, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Comments
WT Docket No. 17-200

Dear Ms. Dortch:

Comtronics Corporation is a leading provider of Private Land Mobile Radio (PLMR) communications services and systems in the greater Boston, Massachusetts area. We are committed to identifying the telecommunications capabilities our customers will need in the future and to working with organizations such as EWA to ensure that the FCC rules and spectrum required to support those capabilities are available. It is for this reason that we urge the Commission to adopt rules providing for a private enterprise broadband network in the 935-940 MHz band as proposed by EWA and pdvWireless, Inc.

Comtronics is a privately held, family-owned business that has been serving the PLMR community, including governmental, business enterprise and critical infrastructure entities, for decades. Comtronics has extensive experience with their technical and operational requirements. The company has assisted our customers as they have migrated from single-channel analog systems to multi-channel digital trunked facilities and has helped them expand their operations to include GPS and other functionalities that are critical in today's business environment. Comtronics has already identified a need for LTE broadband capability for a number of its PLMR customers and believes that a 900 MHz private carrier broadband network focused on this user community will be a highly desirable option for those whose requirements are not met on a commercial network

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This additional competitive offering will benefit PLMR users just as the Nextel Communications iDEN network provided a business-centric nationwide cellular alternative that was highly valued by many of our customers, often as an adjunct to their private internal systems. Some PLMR service providers may have considered iDEN a competitor; Comtronics viewed it as a valuable option that was better suited for some of its customers' business communications than the more consumer-oriented wireless networks. We expect the same will be true with a 900 MHz private carrier broadband network.

Comtronics holds 900 MHz spectrum and operates 900 MHz trunked commercial systems, but it cannot offer its customers a tailored broadband service. However, by working with PDV, or whoever the broadband licensee will be, the company will be able to expand the solutions it can provide customers to include advanced voice and data solutions in a band whose propagation characteristics will make infrastructure costs reasonable. This will mean more and better choices for our business customers in a wireless marketplace that focuses primarily on consumer offerings.

For these reasons, Comtronics urges the Commission to proceed promptly in proposing rules for a 900 MHz private carrier broadband network.

Respectfully,



Catherine Leonard
President